1	James Isbester (State Bar No. 129820) Byron R. Chin (State Bar No. 259846)		
2	KILPATRICK TOWNSEND & STOCKTON LI 1080 Marsh Road	_P	
3	Menlo Park, CA 94025		
4	Telephone: (650) 326-2400 Facsimile: (650) 326-2422 Facsilia iich acta (Okilarati aktawa acad acad		
5	Email: jisbester@kilpatricktownsend.com Email: bchin@kilpatricktownsend.com		
6	Michael D. Switzer ( <i>Pro Hac Vice</i> )		
7	Brian C. Bianco ( <i>Pro Hac Vice</i> ) Alissa R. Pohlman ( <i>Pro Hac Vice</i> ) Peter G. Hawking ( <i>Pro Hac Vice</i> )		
8	Peter G. Hawkins ( <i>Pro Hac Vice</i> ) Akerman LLP 71 S. Wacker Dr., 46 <sup>th</sup> Floor		
9	Chicago, IL 60606		
10	Telephone: (312) 634-5700 Facsimile: (312) 424-1900 Email: michael.switzer@akerman.com		
11	Email: brian.bianco@akerman.com		
12	Email: alissa.pohlman@akerman.com Email: peter.hawkins@akerman.com		
13	Attorneys for Defendant Renesas Electronics America Inc.		
14	Renesas Liectronics America Inc.		
15	UNITED STATES DISTRICT COURT		
16	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
17	SAN FRANCISCO DIVISION		
18	ANDREW REIBMAN,	Case No. 3:11-CV-03847-JCS	
19	Plaintiff,	Magistrate Judge Joseph C. Spero	
20	v.	RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT	
21	RENESAS ELECTRONICS AMERICA INC.,	DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS	
22	Defendant.	ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE	
23		PROTECTIVE ORDER	
24		Date: May 9, 2014 Time: 9:30 a.m.	
25		Courtroom: G, 15 <sup>th</sup> Floor, SF Judge Joseph C. Spero	
26		care of any bar of a bar of	
27			
28			

RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER -- CASE NO. 3:11-CV-03847-JCS

1 Pursuant to Local Rule 7-3(d), Defendant Renesas Electronics America Inc. ("REA") 2 submits the following Statement Of Recent Decision relevant to REA's Reply In Support Of 3 REA's Motion To Modify The Protective Order (Dkt No. 197) ("Reply"). 4 On April 22, 2014 (after REA's Reply was filed), the appellate court in the Mitsubishi Case entered a decision that, inter alia, affirmed the lower court's order for a new trial as to 5 6 damages, and affirmed the denial of Mitsubishi's motion for judgment notwithstanding the verdict 7 (the "Opinion"). (See Opinion at 8-12, a true and correct copy is attached hereto as Ex. A.) The 8 Opinion is silent as to when a potential re-trial will occur, or whether discovery will re-open. 9 The Opinion affects the statement made by REA in its Reply that "[t]he Mitsubishi case is currently on appeal and discovery in that case is closed . . .[t]here is no indication that the 10 11 Mitsubishi Case will be re-litigated, let alone discovery in that case be re-opened." (Dkt No. 196 12 at 2; Dkt No. 197 at 3). This statement was made in rebuttal to Grail's claim that REA seeks to 13 funnel discovery to Mitsubishi in the Mitsubishi Case. (See Dkt No. 196 at 2.) While the entry of 14 the Opinion indicates that the Mitsubishi Case may no longer be on appeal, for the reasons stated 15 in REA's Reply, this does not affect REA's Motion To Modify The Protective Order. (See, e.g., 16 Dkt No. 197 at 3 (stating "even if discovery resumes in that case [the Mitsubishi Case] . . . Grail 17 possesses the same documents that Grail produced to REA. Mitsubishi—or any other party in that 18 case—could simply request the documents from Grail.")) 19 Wherefore, REA respectfully requests that its Motion To Modify The Protective Order be 20 GRANTED. 21 Dated: April 23, 2014 Respectfully submitted, 22 KILPATRICK TOWNSEND & STOCKTON LLP 23 AKERMAN LLP 24 By: /s/ Peter G. Hawkins 25 One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC. 26 27 28

2

<sup>&</sup>lt;sup>1</sup> The "Mitsubishi Case" refers to the litigation discussed in REA's Reply. (Dkt No. 197 at 3, fn. 2.) RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER -- CASE NO. 3:11-CV-03847-JCS

		7 17 20/1	
	CERTIFICATE OF SERVICE		
1	I hereby certify that on April 23, 2014 the foregoing document was filed electronically		
2	with the Clerk of Court to be served by operation of the Court's Electronic Case Filing system		
3	upon all counsel of record. Counsel includes:		
4			
5	•    •	n Lee Boyd	
6		gsrbr-law.com rcz, Rimberg, Boyd & Rader, LLP	
7	630 Hansen Way Palo Alto, CA 94304 6310 S Suite 3	San Vicente Blvd.	
8	Telephone: (650) 798-6700 Los An	ngeles, CA 90048	
9	$\  \text{ Fax} \cdot (650)^{2}/98-6^{2}/01 = \frac{1}{2}$	none: (323) 302-9488 nile: (323) 931-4990	
10	)   Interes	sted Party	
11	Schwa Christy V. LaPierre	rcz, Rimberg, Boyd & Rader, LLP	
12	Christy.lapierre@klgates.com		
13	K&L Gates LLP Four Embarcadero Center		
14	Suite 1200 San Francisco, CA 94111		
15	Telephone: (415) 882-8200		
16	Attorneys for Plaintiff		
17	7   Andrew Reibman		
18	3		
19		ter G. Hawkins	
20	)	ne Attorneys for Defendant	
21	RENESA INC.	AS ELECTRONICS AMERICA	
22			
23	3		
24	4		
25	5		
26	5		
27	RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-03847-JCS		
28	3		

I hereby certify that on April 23, 2014 the foregoing document was served via U.S. Mail on the following:  Jessica Chen, Esq. Bird, Marella, Boxer, Wolpert, Nessim, Drooks & Lincenberg, P.C. 1875 Century Park Last, 23rd Ploor Los Angeles, California 90067-2561  Vincent Filardo Jr. Mishcon de Reva New York LLP Tör Ah Avenue - 26th Floor New York, NY 10019  Jonathan D. Hicks Cadence Design Systems, Inc. 2655 Seeley Ave., Bldg. 5 San Jose, CA 95134  Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II Sl50 North Central Expressway, 10th Floor Dallas, TX 75206  Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II Sl50 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, LLP. Counsel for Third Party Howison & Arnott, LLP. Counsel for Third Party Howison & Arnott, LLP. Counsel for Third Party Provisto International Holdings/MicroAccel  By: /s/ Peter G. Hawkins One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV- 0847-JCS  Hambeas Sterney of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV- 0847-JCS  Hambeas Sterney of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV- 0847-JCS  Hambeas Sterney of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RESEASAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RESEASAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RESEASAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV-				
on the following:  Jessica Chen, Esq. Bird, Marella, Boxer, Wolpert, Nessim, Drooks & Lincenberg, P.C. 1875 Century Park East, 23rd Floor Los Angeles, California 90067-2561  Counsel for Third Party Khosrow Benyamin  Vincent Filardo Jr. Mishoon de Reva New York LLP 750 7th Avenue - 26th Floor New York, NY 10019  Jonathan D. Hicks Cadence Design Systems, Inc. 2655 Seeley Ave., Bldg. 5 San Jose, CA 95134  Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II 815 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, LL.P.  Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: /s/ Peter G. Hawkins One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV- 00847-CS		CERTIFICATE OF SERVICE		
Jessica Chen, Esq. Bird, Marella, Boxer, Wolpert, Nessim, Drooks & Lincenberg, P.C. 1875 Century Park East, 23rd Floor Los Angeles, California 90067-2561 Counsel for Third Party Khosrow Benyamin  Vincent Filardo Jr. Mishcon de Reva New York LLP 7507 th Avenue - 26th Floor New York, NY 10019 Jonathan D. Hicks Cadence Design Systems, Inc. 2655 Seeley Ave., Bldg. 5 San Jose, CA 95134  Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II 8150 North Central Expressway, 10th Floor Dallas, TX 75206  Kelly J. Kubasta LLP Campbell Centre II 8150 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, LL.P. LL.P.  B Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: /s/ Peter G. Hawkins  One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIPY THE PROTECTIVE ORDER - CASE NO. 3:11-CV-05847-CS  Oseaf-3CS	1	I hereby certify that on April 23, 2014 the foregoing document was served via U.S. Mail		
Bird, Marella, Boxer, Wolpert, Nessim, Droks & Lincenberg, P. C. 1875 Century Park East, 23rd Floor Los Angeles, California 90067-2561  Counsel for Third Party Khosrow Benyamin  Vincent Filardo Jr. Mishcon de Reva New York LLP 750 7th Avenue - 26th Floor New York, NY 10019  Jonathan D. Hicks Cadence Design Systems, Inc. 2655 Seeley Ave., Bidg. 5 San Jose, CA 95134  Kelly J. Kubasta, Esq. Kelmchuk Kubasta LLP Campbell Centre II 8150 North Central Expressway, 10th Floor Dallas, TX 75206  Kelly J. Kubasta, LLP Campbell Centre II 8150 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, LLP.  Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nv 89103  By: /s/ Peter G. Hawkins One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENISAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENISAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV- 08447-US	2	on the following:		
1875 Century Park East, 23rd Floor Los Angeles, California 90067-2561  Counsel for Third Party Khosrow Benyamin  Vincent Filardo Jr. Mishcon de Reva New York LL.P 750 7th Avenue - 26th Floor New York, NY 10019  Jonathan D. Hicks Cadence Design Systems, Inc. 2655 Seeley Ave., Bldg. 5 San Jose, CA 95134  Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II 8150 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Armott, LL.P.  Joe Laxague Crane Clark LLP 3272 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: /s/ Peter G. Hawkins One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUpport Of RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUpport Of RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUpport Of RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUpport Of RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV-08347-US	3	Bird, Marella, Boxer, Wolpert, Nessim,	Oteegee Innovations, Inc.	
Los Angeles, California 90067-2561  Las Vegas, NV 89103  Counsel for Third Party Khosrow Benyamin  Vincent Filardo Jr. Mishcon de Reva New York LLP 750 7th Avenue - 26th Floor New York, NY 10019  Jonathan D. Hicks Cadence Design Systems, Inc. 2655 Seeley Ave., Bldg. 5 San Jose, CA 95134  Kara Szpondowski Niro Haller & Niro Chicago, IL 60602  Counsel for Grail Semiconductor  Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II Sto North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, LLP.  Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: /s/ Peter G. Hawkins One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV-03847-JCS	4			
Vincent Filardo Jr. Mishcon de Reva New York LLP 750 7th Avenue - 26th Floor New York, NY 10019  Jonathan D. Hicks Cadence Design Systems, Inc. 2655 Seeley Ave., Bldg. 5 San Jose, CA 95134  Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II 8150 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, LLP. Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: /s/ Peter G. Hawkins One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV- 03847-JCS  Robert Stern 5940 Encina Rd., #5 Goleta, CA 93117  Robert Stern 5940 Encina Rd., #5 Goleta, CA 93117  Kara Szpondowski Niro Haller & Niro 181 W. Madison Street Suite 4600 Chicago, IL 60602  Counsel for Grail Semiconductor  Mark Pettinari, Esq. PO Box 280462 San Fracisco, CA 94128 San Fracisco, CA 94128  Counsel for Third Party Chipworks USA Holdings, Inc.  Counsel for Third Party Chipworks USA  Counsel for Third Party Chipworks USA  Counsel for Third Party Chipworks USA  Holdings, Inc.  Robert Stern 5940 Encina Rd., #5 Goleta, CA 93117	5			
Mishcon de Reva New York LLP 750 7th Avenue - 26th Floor New York, NY 10019  Jonathan D. Hicks Cadence Design Systems, Inc. 2655 Seeley Ave., Bldg. 5 San Jose, CA 95134  Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II Sl50 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, LLP.  Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: /s/ Peter G. Hawkins  One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV-03847-JCS	6	Counsel for Third Party Khosrow Benyamin		
750 7th Avenue - 26th Floor New York, NY 10019   10	7			
Jonathan D. Hicks Cadence Design Systems, Inc. 2655 Seeley Ave., Bldg. 5 San Jose, CA 95134  Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II 8150 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, LL.P. Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: _/s/ Peter G. Hawkins  One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV- 03847-CS	8	750 7th Avenue - 26th Floor		
Cadence Design Systems, Inc. 2655 Seeley Ave., Bldg. 5 San Jose, CA 95134  Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II S150 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, LL.P.  Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By:/s/ Peter G. Hawkins One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV- 08847-JCS	9	Jonathan D. Hicks	Kara Szpondowski	
San Jose, CA 95134  Suite 4600 Chicago, IL 60602  Counsel for Grail Semiconductor  Mark Pettinari, Esq. PO Box 280462 San Francisco, CA 94128  San Francisco, CA 94128  Counsel for Third Party Howison & Arnott, L.L.P.  Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: /s/ Peter G. Hawkins  One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV- 08847-JCS	10	Cadence Design Systems, Inc.	Niro Haller & Niro	
Counsel for Grail Semiconductor  Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II S150 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, L.L.P.  Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: _/s/ Peter G. Hawkins  One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV- 08847-JCS	11	San Jose, CA 95134	Suite 4600	
Kelly J. Kubasta, Esq. Klemchuk Kubasta LLP Campbell Centre II 8150 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, L.L.P.  Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: /s/ Peter G. Hawkins One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC. RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV- 03847-JCS	12			
Klemchuk Kubasta LLP Campbell Centre II  8150 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, LLP.  Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: _/s/ Peter G. Hawkins  One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-03847-JCS	13		·	
8150 North Central Expressway, 10th Floor Dallas, TX 75206  Counsel for Third Party Howison & Arnott, L.L.P.  Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: _/s/Peter G. Hawkins  One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV- 03847-JCS	14	Klemchuk Kubasta LLP	PO Box 280462	
Holdings, Inc.  Counsel for Third Party Howison & Arnott, L.L.P.  Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: _/s/ Peter G. Hawkins  One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER - CASE NO. 3:11-CV- 03847-JCS	15	8150 North Central Expressway, 10th Floor		
Joe Laxague Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By: _/s/ Peter G. Hawkins One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-03847-JCS	16			
Crane Clark LLP 3273 E. Warm Springs Road Las Vegas, Nevada 89120  Counsel for Third Party Provisto International Holdings/MicroAccel  By:/s/ Peter G. Hawkins  One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV- 03847-JCS	17			
19 3273 E. Warm Springs Road Las Vegas, Nevada 89120  20 Counsel for Third Party Provisto 21 International Holdings/MicroAccel  22 By: _/s/ Peter G. Hawkins  24 One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  26 RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-03847-JCS	18			
Counsel for Third Party Provisto International Holdings/MicroAccel  By:/s/ Peter G. Hawkins  One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-03847-JCS	19	3273 E. Warm Springs Road		
21 International Holdings/MicroAccel  22 By:/s/ Peter G. Hawkins  24 One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  26 RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-03847-JCS	20			
By: /s/ Peter G. Hawkins  One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-03847-JCS	21			
One of the Attorneys for Defendant RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV- 03847-JCS	22			
RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-03847-JCS	23	By	y: /s/ Peter G. Hawkins	
INC.  26  RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-03847-JCS	24		One of the Attorneys for Defendant	
RENESAS ELECTRONICS AMERICA INC.'S STATEMENT OF RECENT DECISION RELEVANT TO REPLY IN SUPPORT OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-03847-JCS	25			
OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-03847-JCS	26			
	27	OF RENESAS ELECTRONICS AMERICA INC.'S MOTION TO MODIFY THE PROTECTIVE ORDER CASE NO. 3:11-CV-		
	28	03847-JCS	4	